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8 Attorney for Plaintiff

9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA

11 TONYA HALE,	)	CASE NO. 2:19-cv-00780-JCM-VCF
	)	
12	)	
13 Plaintiff,	)	UNOPPOSED MOTION TO EXTEND TIME
	)	FOR DEFENDANTS TO FILE
14 vs.	)	RESPONSIVE PLEADINGS TO
	)	PLAINTIFF'S COMPLAINT
	)	
15	)	
16 THE COSMOPOLITAN OF LAS VEGAS;	)	
17 NV PROPERTY 1, LLC dba THE	)	
18 COSMOPOLITAN OF LAS VEGAS, a	)	
Nevada Limited Liability Company;	)	
19 RICHARD SHERMAN, an individual,	)	
	)	
20 Defendants.	)	
	)	
21	)	
22	)	

23 COMES NOW the Plaintiff, Tonya Hale ("Plaintiff" or "Hale"), and pursuant to Fed. R.  
24 Civ. P. 6(b), respectfully submits this Unopposed Motion to Extend Time for Defendants to File  
25 Responsive Pleadings to Plaintiff's Complaint until July 31, 2019. No previous request for  
26 extension has been made and this motion is submitted prior to the expiration of the original time  
27 period for responsive pleadings.  
28

1           1.       On May 6, 2019, Hale, through her counsel, filed a Complaint against Defendants  
2 Richard Sherman ("Sherman") and The Cosmopolitan, NV Property 1, LLC d/b/a The  
3 Cosmopolitan of Las Vegas ("TCOLV") (Sherman and TCOLV collectively referred to as  
4 "Defendants"). Both Defendants have been served with the Complaint.

5           2.       The current due date for responsive pleadings on behalf of the respective  
6 Defendants has not yet expired. Plaintiff understands that both of the Defendants deny liability in  
7 this matter.

8           3.       Plaintiff has been in contact with representatives of TCOLV. TCOLV has  
9 requested an extension of time for all Defendants to file responsive pleadings through July 31,  
10 2019. Plaintiff does not object to this request.

11           4.       Accordingly, there is good cause to postpone the responsive pleading deadline  
12 since doing so will allow the parties to effectively use their resources to attempt to reach a  
13 potential resolution, will further the ends of justice by affording the Defendants time to adequately  
14 respond to the claims and allegations in the Complaint if resolution is not reached, and will  
15 promote judicial economy.

16           WHEREFORE, Plaintiff respectfully requests that this Court grant this Unopposed Motion  
17 to Extend Time for Defendants to File Responsive Pleadings to Plaintiff's Complaint until July 31,  
18 2019.

19           The undersigned, counsel of record for Plaintiff TONYA HALE certify that there are no  
20 known interested parties other than those participating in the case.  
21

22  
23  
24           DATED: 6/11/2019

LAW OFFICES OF MICHAEL P. BALABAN

25  
26           BY: /s/ Michael P. Balaban  
27           Michael P. Balaban, Esq.  
28           LAW OFFICES OF MICHAEL P. BALABAN  
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ORDERED, that the Unopposed Motion to Extend Time for Defendants to File Responsive Pleadings to Plaintiff's Complaint be, and hereby is, GRANTED, and it is

IT IS SO ORDERED

United States Magistrate Judge

DATED: \_\_\_\_\_